

REMARKS

I. Status of Application

Claims 1-14 are all the claims pending in the application. Claims 1-14 presently stand rejected.

By the present amendment, claims 1 and 12-14 have been amended.

II. Objections to the Specification

The Examiner has objected to the specification alleging various informalities. The specification has been amended, as set forth above, to address the informalities noted by the Examiner. Accordingly, Applicant respectfully requests that the Examiner withdraw these objections.

III. Claim Rejections Under 35 U.S.C. § 103

Claims 1-14 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Krieg et al. (4,265,556) in view of Oda (5,277,506). Applicant respectfully traverses these rejections for *at least* the reasons set forth below.

In order for the Examiner to maintain a rejection under 35 U.S.C. §103, the cited references must teach or suggest all of the recitations of claims 1-14. Applicant respectfully submits that Krieg, Oda, and any combination thereof, fails to teach or suggest all of the recitations of claims 1-14.

For example, without conceding to the merits of the Examiner's rejections, independent claim 1 has been amended, as set forth above, to recite (among other things):

...a controller ...that determines said print start position based on a result of detecting said edge of another medium to be printed without using a result of detecting the other edge that is guided by said movable guide.

Neither Krieg, Oda, nor any combination thereof, teaches or suggests these features.

The grounds of rejection rely on Krieg as allegedly teaching the claimed controller. However, in stark contrast to the recitations of claim 1, Krieg teaches that the print start position is determined based on a result of detecting both edges of the paper. Specifically, Krieg teaches that the stored value in left edge register 102 enters paper-width subtraction circuit 118 over line 128 and is subtracted from the selected right edge value from selector 114 which inputs paper width subtraction circuit 118 over line 116 (column 6, lines 40-44). Krieg teaches that the difference value from paper width subtraction circuit 118 corresponds to the actual sensed width of paper 22 (column 6, lines 44-46).

Accordingly, since Krieg teaches that the print start position is determined based on a result of detecting both edges of the paper, Krieg does not teach, and cannot possibly suggest, the claimed features of a controller that determines said print start position based on a result of detecting said edge of another medium to be printed without using a result of detecting the other edge that is guided by said movable guide. Further, Oda fails to remedy the deficient teachings of Krieg.

Therefore, claim 1 is patentable over the cited references for *at least* these reasons. Moreover, the dependent claims 2-11 are patentable *at least* by virtue of their dependency.

In view of the similarity between the requirements of claims 12-14 and the requirements discussed above with respect to independent claim 1, Applicant respectfully submits that arguments analogous to the foregoing arguments as to the patentability of independent claim 1 demonstrate the patentability of claims 12-14. As such, it is respectfully submitted that claims 12-14 are patentably distinguishable over the cited references at least for reasons analogous to those presented above. Thus, the allowance of these claims is respectfully solicited of the Examiner.

IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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